

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT

NICHOLAS J. LOUISA, ESQ.,

Plaintiff,

v

NETFLIX, INC., NETFLIX WORLDWIDE
ENTERTAINMENT, LLC, JIGSAW
PRODUCTIONS LLC, MUDDY WATERS
PRODUCTIONS LLC, ALEX GIBNEY,
RICHARD PERELLO, STACEY KNOWLES,
LISA SIEGEL BELANGER, LONNIE
BRENNAN and the BOSTON BROADSIDE,

Defendants.

Civil Action No. 2081CV01945

**INTERESTED NONPARTY JOHN SAVANOVICH'S EMERGENCY
MOTION TO IMPOUND AND FOR A PROTECTIVE ORDER**

Interested Nonparty John Savanovich ("Mr. Savanovich") hereby makes a limited appearance¹ for the sole purpose of asking the Court to protect him from certain further harm relating to events at issue in the Amended Complaint. This Motion is being filed on an emergency basis given that this Court's current impoundment order is set to expire today. Mr. Savanovich requests that, until the Court is able to resolve this Motion, it further extends its order of impoundment until the Court rules on this Motion.

Through this Motion, Mr. Savanovich respectfully asks this Court to extend the protections afforded to him by the Massachusetts Probate Court for Norfolk County ("Probate Court") by impounding, at least, all documents in this case that relate to him and, additionally, by

¹ Mr. Savanovich reserves all rights and is not making a general appearance. See Mass. R. Civ. P. 11(b)(3); Uniform Rule of Impoundment Procedure 6(a).

issuing his related proposed order attached as Exhibit A to the Affidavit of Attorney Lisa M. Cukier.

Mr. Savanovich makes this Motion under Rule 2 of the Uniform Rules on Impoundment Procedure, Rule 26(c) of the Massachusetts Rules of Civil Procedure ("Rule 26(c)"), as well as the Court's inherent powers. Pursuant to Massachusetts Superior Court Rule 9A, this Motion is accompanied by a supporting memorandum of law, filed herewith stating the reasons, including supporting authority, why this Motion should be granted.

In compliance with Uniform Rule 2(a)(1), this Motion is accompanied by a proposed findings and order. As Mr. Savanovich is a non-party he has further provided an affidavit identifying the nature of his interest and facts upon which he relies. Uniform Rule 6(a). Mr. Savanovich has also filed the limited notice of appearance required from nonparties. (*See Id.*)

Mr. Savanovich requests a hearing, unless the Court will grant this Motion on the papers.

September 2, 2020

Respectfully Submitted,

MR. JOHN SAVANOVICH
By his attorneys,

/s/ Lisa M. Cukier, Esq.

Lisa M. Cukier, BBO No. 558824

lcukier@burnslev.com

Eric G. J. Kaviar, BBO No. 670833

ekaviar@burnslev.com

Russell J. Smith, BBO No. 688873

rsmith@burnslev.com

BURNS & LEVINSON LLP

125 High Street

Boston, Massachusetts 02110

Tel: 617.345.3000

Fax: 617.345.3299

CERTIFICATE OF SERVICE

I, Eric G. J. Kaviar, hereby certify that I caused this document, and any supporting materials, to be served on all counsel of record via email and/or regular mail, postage prepaid, today, September 2, 2020. To the extent a Party has not made an appearance on the docket, and has no known counsel of record, today I also caused this document, and any supporting materials, to be served on such Parties via regular mail, postage prepaid, and I also asked Plaintiff to email these materials to any Defendant that Plaintiff is in contact with over email.

/s/ Eric G. J. Kaviar, Esq.
Eric G. J. Kaviar, Esq.